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<http://www.state.ak.us/dec/home.htm>

**DIVISION OF AIR AND WATER QUALITY
AIR PERMITS PROGRAM**

**CERTIFIED MAIL NO.: Z 700 0520 0024 4825 8713
RETURN RECEIPT REQUESTED**

July 19, 2001

Mr. Hank Nikkels
Municipal Light and Power
1200 East First Avenue
Anchorage, AK 99501-1685

Re: Notification of decision to approve Owner Requested Limit for the Municipal Light and Power Service Complex, Paint Spray Booth, ORL No. 618ORL01

Dear Mr. Nikkels:

The Department received your application for an Owner Requested Limit (ORL) on April 30, 2001, seeking owner-requested limit(s) for the Municipal Light and Power (ML&P) Service Complex, Paint Spray Booth. Based on the supplied information, your notarized certification, and a finding that your request meets the requirements of 18 AAC 50.225(b), the Department has decided to issue an approval of the limits requested in your application. The Department conducted a 30-day public comment period starting June 1, 2001 and ending July 2, 2001.

ML&P's proposed limits, contained herein, shall apply to the annual usage of coatings that contain volatile organic compounds (VOCs) and hazardous air pollutants (HAPs).

You are not relieved of maintaining compliance with the applicable emission standards for fuel burning equipment or general prohibitions that apply to your facility. This includes the opacity, particulate matter, and sulfur dioxide standards in 18 AAC 50.055(a-c), and the prohibitions of 18 AAC 50.045, 18 AAC 50.065 (open burning), and 18 AAC 50.110. Included is a blank Excess Emissions Notification Form. Please copy the blank form and retain for future use.

The conditions contained within this ORL are imposed to ensure that the total potential VOCs and HAPs emissions from the paint spray booth do not exceed the classification triggers listed in 18 AAC 50.300.

Clean Air, Clean Water

Mr. Hank Nikkels
618ORL01

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July 19, 2001

This is a preliminary permit action for purposes of review under AS 46.14.200. A person who has a private, substantive, legally-protected interest under State law that may be adversely affected by the permit action, the owner and operator, or a person who participated in the public comment process may request an adjudicatory hearing under 18 AAC 15.200-910. The request should be mailed to the Commissioner, Alaska Department of Environmental Conservation, 410 Willoughby Avenue, Suite 105, Juneau, Alaska 99801-1795, by certified mail, return receipt requested. A copy of the request shall also be sent to the undersigned. The right to administrative review will be waived if no request for an adjudicatory hearing is served within 30 days of the date of this letter. Any hearing granted will be limited to issues related to the issuance of this Owner Requested Limit approval. If an adjudicatory hearing is thereafter granted, all ORL conditions remain in full force and effect.

Should you have questions regarding this action or other related matters, please contact me at (907) 269-7575.

Sincerely,

Bill MacClarence, P.E.
Supervisor, Air Operating Permits

Enclosure: Owner Requested Limit No. 618ORL01
Excess Emission Notification Form

cc: ADEC/APP, Anchorage (File Copy)
ADEC/APP, Juneau (File Copy)
ADEC/APP, Fairbanks (File Copy)
Laurie Kral, EPA Region 10, Seattle
John Pavitt, EPA/AOO
Jacqueline Rose, Hoefler Consulting Group
Cynthia Espinoza, APP

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State of Alaska - Air Operating Permit Program
Owner Requested Limit

FACILITY IDENTIFICATION:

No. 618ORL01

Owner/Operator:	Municipality of Anchorage, d/b/a Anchorage Municipal Light and Power
Facility Name:	ML&P Service Complex
Facility Address:	1201 East Third Avenue
City, State, Zip:	Anchorage, Alaska 99501-1685
Facility Contact:	Mr. Larry Frick
Phone Number:	(907) 263-5830

The above-named owner/operator has submitted a complete application for an owner-requested limit under 18 AAC 50.225(b) for the Paint Spray Booth. The Department grants an owner-requested limit to restrict the potential to emit of the facility to avoid the requirement for an operating permit under 18 AAC 50.325(b)(1)-(b)(2), and to ensure protection of ambient air quality standards and increments established in 18 AAC 50.010. The Department certifies that the owner-requested limit is effective as of the date noted below.

In accordance with 18 AAC 50.225(f), the applicant has agreed to the conditions listed on the following pages.

The owner or operator may revise this limit under 18 AAC 50.225(h) by submitting a new request under 18 AAC 50.225(b). This limit remains in effect until the revision is approved. The owner or operator may terminate this limit according to the procedures of 18 AAC 50.225(h).

I understand and agree to the terms and conditions of this approval.

Owner or Operator

Printed Name

Title: _____

This certifies that on _____, (date) the person named above appeared before me, a notary public

in _____ and for the State of _____, and signed the above statement in my presence.

Notary Signature & Seal _____

My commission expires: _____

Department approval:

Bill MacClarence, P.E., Supervisor
Air Operating Permits

Owner Requested Limit Effective Date

CONDITIONS:

1. ML&P shall apply no more than:
 - a) 1,000 gallons of polyurethane coating per consecutive twelve-month period;
 - b) 500 gallons of urethane hardener, DU5 and DU6, per consecutive twelve-month period;
 - c) 500 gallons of temperature reducer, DT860 and DT870, per consecutive twelve-month period.
2. ML&P shall record the following information, to monitor the daily usage of coating, hardener, and temperature reducer from the paint spray booth;
 - a) date;
 - b) description of coating used (polyurethane coating, urethane hardener, reducer);
 - c) gallons of each coating used per day.
3. ML&P shall summarize:
 - a) monthly the daily actual usage records for each coating;
 - b) monthly the consecutive twelve-month period of gallons used for each coating;
 - c) annually the tons per year of VOCs and HAPs emitted. The calculations shall show VOCs and HAPs content of the coatings, material density, and assumptions made.
4. ML&P shall submit in an annual compliance report:
 - a) a summary of the consecutive twelve-month period of gallons used for each coating for the year, confirming compliance with condition 1;
 - b) the estimated tons of VOCs and HAPs emitted per year, confirming compliance with condition 3.
5. ML&P shall keep copies of reports and certifications required by this approval.
6. ML&P shall submit two copies and the original of the annual compliance report to the Alaska Department of Environmental Conservation, Air Permits Program, 610 University Avenue, Fairbanks, Alaska, 99709-3643. The annual compliance report is due by February 1 of each year and shall cover the period for the preceding year. The annual compliance report shall contain the certification statement listed in 18 AAC 50.205.
7. ML&P shall report any excess air emissions or deviations from the above conditions to ADEC no later than seven days after discovering the exceedance or deviation. To report the excess emissions, ML&P must fax a completed and signed Excess Emission Notification Form to ADEC at (907) 269-7508. The Excess Emission Notification Form may be obtained from ADEC's web page at: <http://www.state.ak.us/dec/dawq/aqm/eeform.pdf>.

Statement of Avoided Requirement:

The potential to emit for the sources listed in Table 1 are reduced to less than 100 tons per year (tpy) for any regulated air contaminant, less than 10 tpy for any individual HAP and 25 tpy for total HAPs by limiting the coatings total gallons usage. With this ORL the estimated VOCs emissions are 5.4 tpy. In accordance with 18 AAC 50.210, the capacity of the facility to emit an air contaminant is verifiable through the monitoring, record keeping, and reporting contained in this approval. By limiting the potential to emit of the sources listed in Table 1, the owner/operator is avoiding the requirement to obtain an operating permit by avoiding classification of the Paint Spray Booth under AS 46.14.130(b), and 18 AAC 50.325(b)(1)- (b)(2).

Table 1 – Source Inventory Subject to Limits

Code	Trade Name	Annual Limit (gal/yr)
DGHS	Durethane II Polyurethane	1,000
DU5	Urethane Hardener	500
DU6	Urethane Hardener	
DT860	Cool Temperature Reducer	500
DT870	Medium Temperature Reducer	

Excess Emission Notification Form

Please copy (retain blank copy for your records) and complete this form, fax to: State of Alaska, Department of Environmental Conservation, Division of Air and Water Quality, Air Permits Program, 555 Cordova, Anchorage, AK 99501, Fax: (907) 269-7508, Phone: (907) 269-7577.

Company Name: Municipal Light and Power Application No.: 618ORL01 Facility Name: ML&P Service Complex, Paint Spray Booth

Reason for notification:

☐ Excess Emission ☐ Permit Condition Exceedence

Event Information (Use 24-hour clock):

	START Time:	END Time:	Duration (hr:min):
Date: _____	_____ : _____	_____ : _____	_____ : _____
Date: _____	_____ : _____	_____ : _____	_____ : _____
		Total:	_____ : _____

(A) Cause of Event (Check all that apply):

☐ START UP ☐ UPSET CONDITION ☐ CONTROL EQUIPMENT
☐ SHUT DOWN ☐ SCHEDULED MAINTENANCE ☐ OTHER _____

Attach a detailed description of what happened, including the parameters or operating conditions exceeded.

(B) Sources Involved:

Identify each Emission Source involved in the event, using the same identification number and name as in the Permit. List any Control Device or Monitoring System affected by the event. Attach additional sheets as necessary.

Source ID No.	Source Name	Description	Control Device
_____	_____	_____	_____
_____	_____	_____	_____

(C) Emission Limit and/or Permit Condition Exceeded:

Identify each Emission Standard and Permit Condition exceeded during the event. Attach a list of ALL known or suspected injuries or health impacts. Attach additional sheets as necessary.

Permit Condition	Limit	Exceedence
_____	_____	_____
_____	_____	_____

(D) Emission Reduction:

Attach a detailed description of ALL of the measures taken to minimize and/or control emissions during the event.

(E) Corrective Actions:

Attach a detailed description of ALL corrective actions taken to restore the system to normal operation.

Based on information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, accurate, and complete.

Printed Name: _____

Signature: _____

Date: _____